



**Solutia Inc.**  
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P.O. Box 66760  
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Tel 314-674-1000

March 18, 1999

Mr. Michael McAteer  
U. S. EPA - Region 5  
77 West Jackson Boulevard (SR-6J)  
Chicago, Illinois 60604-3590

**Re: Sauget Sites Area I - January 21, 1999 Administrative Order by Consent  
March 1999 Monthly Report**

Dear Mr. McAteer,

Enclosed is the March 1999 Monthly Report for the Sauget Sites Area I. This submittal is in fulfillment of the monthly requirements of Section 2.4 Reporting, of the January 21, 1999 Final Administrative Order by Consent for Sauget Sites Area I, Sauget and Cahokia, Illinois.

Sincerely,

A handwritten signature in black ink, appearing to read "D. M. Light", is written over the typed name.

D. M. Light  
Manager, Remedial Projects  
Solutia Inc.

cc:

T. Gouger - USACE  
P. Takacs - IEPA  
Mayor M. King - Cahokia  
Sauget File - Solutia

## **Sauget Sites Area I - Sauget, Illinois**

### **AOC - EECA / RIFS**

#### **Monthly Report**

**Date of Report:** March 18, 1999  
**Period Covered:** February 19, 1999 - March 18, 1999  
**Next Report Period:** March 19, 1999 - April 18, 1999

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#### **Work Performed during the reporting period**

- None

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#### **Work scheduled for next reporting period**

- None

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#### **Problems and Solutions**

- None

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#### **Submittal Schedule Status (see attached)**

- SSP submitted for EPA review February 22, 1999. Currently under review by EPA.
- March 17, 1999 request submitted to EPA for revision to AOC access schedule requirements

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#### **Issues under review**

- **Dead Creek Flooding** - Solutia is evaluating a proposal by EPA to design and install some early (pre-EECA/RIFS study) flooding improvements focused on the undersized or otherwise constricted culverts along Dead Creek. It is contemplated that this Work would be conducted under a UAO to be negotiated between USEPA and Solutia.

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#### **Comments**

1. The Support Sampling Plan (SSP) was submitted for Agency review February 22, 1999 along with a schedule for the Work.
2. Access procurement is in progress.
3. All contractors to prepare for and implement all AOC Work have been brought under contract. EPA approval for all contractors was received March 16, 1999.

## **January 21, 1999 Sauget Area I AOC**

### **SUBMITTAL SCHEDULE** **(as requested 3/17/99 to be Revised)**

- |  |   |
|--|---|
| 1. Designation of Contractor                         | Completed 3/10/99 <sup>1</sup>  |
| 2. Designation of Other Contractors                  | 5 Business Days Before Start of Work  |
| 3. Designation of Project Coordinator                | Completed   |
| 4. Submit Support Sampling Plan (SSP)                | Submitted February 22, 1999   |
| 5. Submit Revised SSP                                | 21 days after receipt of USEPA comments from 2/22/99 SSP Submittal  |
| 6. Obtain Access Agreements                          | Initiation of process Complete<br>Solutia will use its best efforts to have final Access agreements within 7 days of EPA approval of all documents required to initiate SSP field work. |
| 7. Submit Health and Safety Plan (HASP)              | With Revised SSP (Item 5) submittal   |
| 8. Submit Quality Assurance and Sampling Plan (QAPP) | With Revised SSP (Item 5) submittal   |
| 9. Sampling Notification                             | 10 Business Days Prior to Start of Work   |
| 10. Submit Data Report                               | TBD (Pending approval of SSP Work Schedule)   |
| 11. Submit EE/CA Report                              | 60 Calendar Days After Data Report Submittal  |
| 12. Submit Revised EE/CA Report                      | 21 Calendar Days After Receipt of EPA Comments  |
| 13. Submit RI/FS Report                              | 90 Calendar Days After Data Report Submittal  |
| 14. Submit Revised RI/FS Report                      | 21 Calendar Days After Receipt of EPA Comments  |
| 15. Progress Reports                                 | Monthly Beginning February 19, 1999   |

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<sup>1</sup> Per March 10, 1999 memo DML to M. McAteer re "Notification of Contractors and Contractor Qualifications". EPA approval of all contractors received March 16, 1999 via e-mail correspondence.